

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

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CASSONDRA CASORIO-SAHIN, *et al.* :
as individuals and on behalf of all others :
similarly situated persons,

Plaintiffs, : Case No.: RDB -18-00851
v. : HEARING REQUESTED
PAT'S SELECT PIZZA & GRILL LLC, :
et al., :
Defendants.
----- X

**PLAINTIFFS' CONSENT MOTION
TO APPROVE GLOBAL SETTLEMENT OF ALL CLAIMS
AND ENTER ORDER OF DISMISSAL, WITH PREJUDICE**

All of the plaintiffs, Cassandra Casorio-Sahin, *et al.*, by their undersigned attorneys, respectfully request that the Court approve a global settlement of all claims on the merits, as well as settlement agreements for costs and attorneys' fees, and dismiss this action, with prejudice, and, in support thereof, state as follows:

1. Defendants consent, but only to the relief requested herein, *i.e.*, to approval of the settlement and dismissal of the action with prejudice as set forth herein and in the proposed order. Defendants expressly do not agree with all of the allegations and arguments contained in the accompanying memorandum and reserve all rights as to them.

2. The accompanying memorandum, Exhibits A through F, proposed order, and Local Rule 105 request for hearing are incorporated herein.

3. As set forth in Exhibit A, subject to Court approval, the parties have reached a global settlement of all Federal and State claims, including without limitation, claims on the merits,

for attorneys' fees, and for costs, and request a Local Rule 111 dismissal subject to payment of the sums provided for therein.

4. Because two plaintiffs are over age 40 and are releasing claims under the Age Discrimination in Employment Act, 29 U.S.C. §621, *et seq.*, as amended, certain statutorily-required rights will extend the time necessary to consummation of the settlement.

Wherefore, the plaintiffs request that this Court approve the settlements on the merits, for fees, and for costs, and for such other relief as may be appropriate, and enter the accompanying proposed Order.

July 14, 2020

Respectfully Submitted,

SMITHEY LAW GROUP LLC

/s/
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Co-Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of July, 2020, a copy of the above was electronically filed and served through CM/ECF on counsel of record.

/s/
Michael D. Berman (Bar No. 3010)